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March 28, 1996

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FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF SECRETARY

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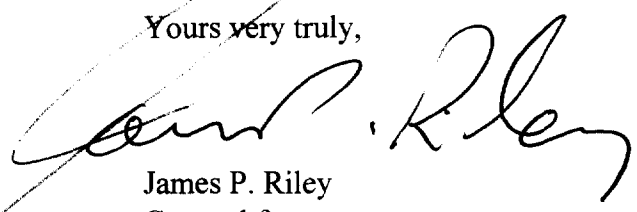
Mr. William F. Caton  
 Acting Secretary  
 Federal Communications Commission  
 1919 M Street, N.W., Suite 222  
 Washington, DC 20554

Re: MM Docket 96-7  
Banks and Redmond, Oregon

Dear Mr. Caton:

Transmitted herewith are the original and four copies of the Joint Comments of Common Ground Broadcasting, Inc. and Combined Communications, Inc., the licensees of the FM broadcast stations involved in the above-referenced rulemaking proceeding, in support of the proposal set forth in the Commission's Notice of Proposed Rulemaking.

Yours very truly,



James P. Riley  
 Counsel for  
 Common Ground Broadcasting, Inc.

JPR/jr  
 Enclosures

cc: J. Dominic Monohan, Esq.  
 Counsel for Combined Communications, Inc.

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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b), ) MM DOCKET NO. 96-7  
Table of FM Allotments ) RM-8732  
(Banks and Redmond, Oregon) )

Directed to: Chief, Allocations Branch

**JOINT COMMENTS**

Common Ground Broadcasting, Inc., ("Common Ground"), licensee of Station KDBX, Banks, Oregon, and Combined Communications, Inc. ("CCI"), licensee of Station KLRR, Redmond, Oregon, by their respective attorneys, hereby respectfully submit their Joint Comments in response to the Commission's *Notice of Proposed Rule Making and Order to Show Cause*, DA 96-14, released February 6, 1996 (*NPRM*). With respect thereto, the following is stated:

1. The *NPRM* was issued in response to Common Ground's Petition for Rule Making, filed November 29, 1995, in which it requested that the Table of FM Allotments, Section 73.202(b) of the Commission's Rules, be amended to substitute Channel 298C1 for Channel 298C2 at Banks, Oregon, and that the license of KDBX be modified to specify operation on the higher class channel. In order to accommodate this upgrade, Common Ground further requested that Channel 269C2 be substituted for Channel 298C2 at Redmond, Oregon, and that the license

of Station KLRR be modified to specify operation on the new channel. The *NPRM* proposes the changes requested by Common Ground.

2. Common Ground continues to support the channel changes proposed in the *NPRM* in order to upgrade the allotment for Station KDBX, Banks, Oregon. The requested changes will allow Common Ground to provide expanded service to the public, to make a more efficient use of the broadcast spectrum, and to provide better service to its current listeners. As set forth in the engineering statement filed with Common Ground's petition, the proposed allotments would meet all of the Commission's spacing requirements. Therefore, the proposed changes would serve the public interest.

3. CCI also supports the amendments to the FM Table of Allotments set forth in the *NPRM*. Station KLRR will receive an equivalent class channel, and its ability to serve the public would remain unchanged. Within the terms of an agreement between CCI and Common Ground, Common Ground will make CCI whole for expenses associated with the change in frequency for KLRR and any disruption to CCI's established operation of KLRR. CCI is fully satisfied with the agreement.

4. Upon grant of the requested channel substitution, Common Ground will promptly submit an application for construction permit to implement the upgrade and will construct the upgraded facilities expeditiously upon grant of that application. CCI will promptly take those steps necessary to change its channel of operation from 298C2 to 269C2.

WHEREFORE, the premises considered, Common Ground and CCI respectfully request that the FM Table of Allotments be amended as set forth in the *NPRM*.

Respectfully submitted,

COMMON GROUND BROADCASTING, INC.

By: 

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March 2<sup>8</sup>, 1996